



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 7

11201 Renner Boulevard  
Lenexa, Kansas 66219

APR 26 2016

**MEMORANDUM**


: Financial Assurance Review  
Financial Test / Corporate Guarantee - 2016

Guarantor: Occidental Petroleum Corporation  
Los Angeles, California 90024

Owner/operator: Occidental Chemical Corporation  
Dallas, Texas 75244

Facility: The Wichita Plant  
6200 South Ridge Road  
Wichita, Kansas 67215  
EPA ID No.: KSD 007482029

Corrective Action Cost: \$4,474,266

**FROM:** Michael Lancaster   
Financial Analyst - SEE Grantee  
AWMD/WEMM

**TO:** Brad Roberts  
Project Manager  
AWMD/WRAP

**FINDINGS:**

A review of the financial assurance documentation submitted by Glenn Springs Holdings, Inc.<sup>1</sup> by letter dated March 30, 2016, shows the facility is in compliance with the financial assurance criteria as specified in 40 CFR Parts 264 and 265.

Specifically:

1. The current corrective action cost estimate amount of \$4,474,266 was properly adjusted for inflation in accordance with 40 CFR 264.142(b) and 265.142(b).

<sup>1</sup> A subsidiary of Occidental Petroleum Corporation

RCRA



549840

2. The Guarantor passes the Corporate Guarantee - Financial Test, Alternative II and satisfies the requirements of 40 CFR 264.143(f) and 265.143(e). The maximum amount of coverage for the financial test is \$4,052,000,000.

NOTE: The Guarantor's Income Statement reports a net loss of -\$7,829,000,000 for fiscal December 31, 2015; it did not passed Alternative I of the financial test. Due to the volatility in the petroleum industry in 2016, the Guarantor's credit ratings (Moody and S&P) should be monitored at least once per quarter.